

**Deposition of Dorian LeBlanc under Rule 30(b)(6) (##649-692)**

Q. And that offer letter stated that his compensation and what was his compensation?

MS. PUNJABI: Ms. Vaks as you know, the judge had ordered that we did, that we did not have to provide that information to you just the start, just the start date so.

MS. VAKS: That wasn't objection.

MS. PUNJABI: But it's, you're going outside the scope of the topics.

MS. VAKS: This is hiring Todd Storch.

MS. PUNJABI: Ms. Vaks, we already have a court order and the court already ruled on this information.

MS. VAKS: No, you don't have it. I'm sorry, but you don't have a court order. You have court order that allows questioning regarding Todd Storch hiring. That's the core of it. I have a copy.

MS. PUNJABI: No, I have it in front of me to that the decision to hire Mr. Storch, you'd asked for information regarding his compensation previously and the court said we did not have to.

MS. VAKS: That doesn't apply to this hearing.

MS. PUNJABI: This this is all the same case.

MS. VAKS: No.

MS. PUNJABI: It is all the same case. It's all part of the discovery. If you'd like, we can, we can pause on that question and continue and then come back to it. Just look at the court orders.

MS. VAKS: We have the court orders that deponent is supposed to answer questions regarding Todd Storch hiring and this is the question regarding Todd Storch hiring. There's nothing else. Anything according to rules, all previous objections does not count.

MS. PUNJABI: Ms. Vaks, I'm not, I'm telling you what, we have court decisions on this issue. If you'd like to continue the deposition, please go ahead.

MS. VAKS: Yes, I would like to, you can—

MS. PUNJABI: I'm instructing him not to respond at this particular issue. After the break, we can reconsider it and come back to it. But that's for now if you'd like to move on, please move on.

Q. Okay. I would like to repeat my question. And so do you confirm that your counsel prohibited your to answer the question about salary or compensation of Todd Storch?

Ms. PUNJABI: I'm instructing you not to answer on regarding his compensation for the moment.

A. I confirm.